

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 23-158 (SRN/TNL)**

United States of America,

Plaintiff,

**MOTION TO COMPEL
DISCOVERY**

vs.

Traigh Sean Tillman,

Defendant.

Defendant, Traigh Sean Tillman, by and through his attorney, Thomas H. Shiah, Esq., respectfully moves the Court for an Order compelling the government to produce the information requested at the motions hearing on August 25, 2023. Specifically, counsel had requested production of any and all medical examiner reports relating to the death of the individual allegedly involved in the altercation with Mr. Tillman. The request included autopsy reports, photos, hierarchy of death report and all medical examiner's reports. The government had represented at the hearing that they would produce these materials but to date and despite repeated inquiries from counsel and various responses from the government, nothing has yet been produced. Finally today, defense counsel received an email advising that an expedited request had been made to the Hennepin County Medical Examiner for the requested materials and that they would be disclosed upon receipt. To ensure production in a timely fashion, counsel is requesting that the Court order disclosure on or before September 22, 2023.

Dated: September 14, 2023

Respectfully submitted,

S/Thomas H. Shiah

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